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**Not for service*

October 21, 2022

BY ECF

Honorable James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jack Norton v. The City of New York et al., 21-CV-4884 (FB) (JRC)

Your Honor:

I represent Plaintiff in the above matter. I write in compliance with the Court's July 21, 2022 Order directing the parties to submit a joint status report by today.

On September 1, 2022, Defendant City of New York served an Offer of Judgment pursuant to Fed.R.Civ.P. 68 on Plaintiff. On September 13, 2022, Plaintiff accepted that Offer of Judgment. Today, Plaintiff filed proof of the offer and acceptance. Once the judgment is entered, Plaintiff will have 14 days within which to file an application for attorney's fees, costs, and expenses. The parties intend to jointly ask that the Court extend the time for Plaintiff to make such an application until 60 days after judgment is entered on the Rule 68 offer, so that the parties can attempt to settle Plaintiff's claim for attorney's fees, costs, and expenses without intervention from the Court, if possible.

Finally, one additional matter remains to be resolved, aside from Plaintiff's claim for attorney's fees, costs, and expenses: On September 9, 2022, Defendant City disclosed around 2000 documents, including records as well as audio and video files, consisting of the Civilian Complaint Review Board ("CCRB") and Internal Affairs Bureau ("IAB") files related to the incident. Defendant City designated many of those documents as CONFIDENTIAL under the Confidentiality Order (ECF No. 35) in this case. Plaintiff has challenged those confidentiality designations, and the parties will meet and confer in good faith efforts to resolve Plaintiff's challenges, if possible. In the event they cannot do so, Plaintiff will bring a challenge to the confidentiality designations to the Court for resolution as provided for in the Confidentiality Order.

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver